



State of Utah

Department of Natural Resources

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August 30, 2006

John Thomas
Legacy Parkway Office
4001 South 700 East, Suite 450
Salt Lake City, UT 84107

Subject: Initial Review of Notice of Intention to Commence Large Mining Operations, Utah Dept. of Transportation, UDOT Beck Street Quarry, M0110003, Task ID# 1531, Davis County, Utah

Dear Mr. Thomas:

The Division has completed our review of your draft Notice of Intention to Commence Large Mining Operations for the UDOT Beck Street Quarry, located in Davis County, Utah, received August 18, 2006. After reviewing the information, the Division has the following comments, which will need to be addressed before tentative approval may be granted.

The comments are listed under the applicable Minerals Rule heading; please format your response in a similar fashion and **address only those items requested in the attached technical review** by sending replacement pages of the original mining notice **using redline and strikeout text**. After the notice is determined technically complete and we are prepared to issue final approval, we will ask that you send us two clean copies of the complete and corrected plan. Upon final approval of the permit, we will return one copy stamped "approved" for your records.

If you have any questions in this regard please contact Lynn Kunzler (538-5310), Dana Dean (538-5320) or myself (538-5358) of the Minerals Staff. If you wish to arrange a meeting to discuss this review, please contact us at your earliest convenience. Thank you for your cooperation in completing this permitting action.

Sincerely,

Susan M. White
Mining Coordinator
Minerals Regulatory Program

SMW:LK:pb
Attachment: Review
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REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

**Utah Dept. of Transportation
UDOT Beck Street Quarry**

M0110003
August 30, 2006

R647-4-105 - Maps, Drawings & Photographs

105.1 Topographic base map, boundaries, pre-act disturbance

The smaller red dots on Figure 3, which are a different shade than those marked "B4," are not identified in the text or on the map. [DD]

105.2 Surface facilities map

The Telecommunications line and gas line mentioned in Table 4 (as being within the UDOT property) need to be shown and labeled on Figure 4. (DD& LK)

R647-4-106 - Operation Plan

106.7 Existing vegetation - species and amount

Vegetation data presented needs to be revised. To establish the reclamation success standard, the Division needs the % ground cover of vegetation. The data presented does not provide this information. Apparently, the sum of relative cover of individual species was reported, not the total vegetation cover. It may be possible to review the field data to determine % ground cover. (By not knowing how many layers of vegetation there are, which results in a very high cover value, would set a potentially un-attainable success standard). (LK)

R647-4-108 - Hole Plugging Requirements

When will drill holes B-1, B-2, B-3A, and B-3B be plugged? [DD]

R647-4-110 - Reclamation Plan

110.5 Revegetation planting program

Please consider revising the proposed seed mix. The mix as proposed is unlikely to provide a diverse and permanent vegetation cover. Please refer to the attached recommendation for suggested changes to your mix. (LK)

The addition of wood chips and biosolids for amending the soil is acceptable. However, it is recommended that no more than 10 ton/acre be used (past experience has shown that with more than 10 tons, problems with weedy species become evident). If possible, this should be mixed with the soil as the soil is replaced. If not possible, then after application of the biosolids and wood chips, the area should be ripped. (LK)

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If seeding occurs shortly after ripping, there is no need to use a roller harrow. In fact, better revegetation success is achieved if the area is not harrowed (left in a roughened condition). (LK)

R647-4-111 - Reclamation Practices

111.12 Topsoil redistribution

Compaction of topsoil with dozers is not recommended. [DD]

R647-4-113 - Surety

In order to verify the reclamation cost estimate, more detail is needed (volumes instead of estimated days, etc.). Also, make sure all equipment needed for each task is accounted for (i.e. given distance soil needs to be moved, a dozer only will not be adequate. Suggest utilizing loader and truck to redistribute the soils prior to spreading). [DD]

Need costs for obtaining and spreading biosolids.

Need costs for ripping prior to seeding.

The Division will also be adding contingencies and escalation to the final amount. (LK)

Revegetation Seed Mixture
UDOT Beck Street Quarry
M0110003

Species		Seeding Rate*	Revised Rate
<u>Agropyron cristatum</u>	Crested wheatgrass	4	0.5
<u>Agropyron elongatum</u>	Tall wheatgrass	0	2
<u>Agropyron smithii</u>	Western wheatgrass	0	2
<u>Agropyron spicatum</u>	Bluebunch wheatgrass	0	2
<u>Oryzopsis hymenoides</u>	Indian ricegrass	3	2
<u>Poa sandbergii</u>	Sandberg bluegrass	0	0.3
<u>Stipa comata</u>	Needle and thread grass	2	1
<u>Penstemon Palmeri</u>	Palmer penstemon	2	0.5
<u>Pacific aster</u>	Aster chilensis	0	0.1
<u>Achelia millefolium</u>	Western Yarrow	0	0.1
<u>Hedysarum boreale</u>	Sweetvetch	0	1
<u>Artemisia tridentata</u>			
<u>Ssp. Wyomingensis</u>	Wyoming big sagebrush	1	0.2
<u>Artemisia nova</u>	Black sagebrush	2	0
<u>Chrysothamnus ssp.</u>	Rabbitbrush	2	
0.5			
<u>Kochia prostrata</u>	Forage Kochia	0	0.5
<u>Purshia Tridentata</u>	Bitterbrush	0	2
Total		20	14.7

* First column is rate proposed in plan (if 0, then species not included in proposed mix). Second column is suggested revision to proposed plan. The suggested revision reduces the rate of highly competitive species, eliminates those species that would not be likely to establish on the site, and adds additional species that are expected to do well and add to the overall diversity of the re-established vegetation.